

Natural Condition  
Assessment for Low pH  
Somerton Creek  
Suffolk, Virginia

**Submitted by**

**Virginia Department of Environmental Quality**

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## Executive Summary

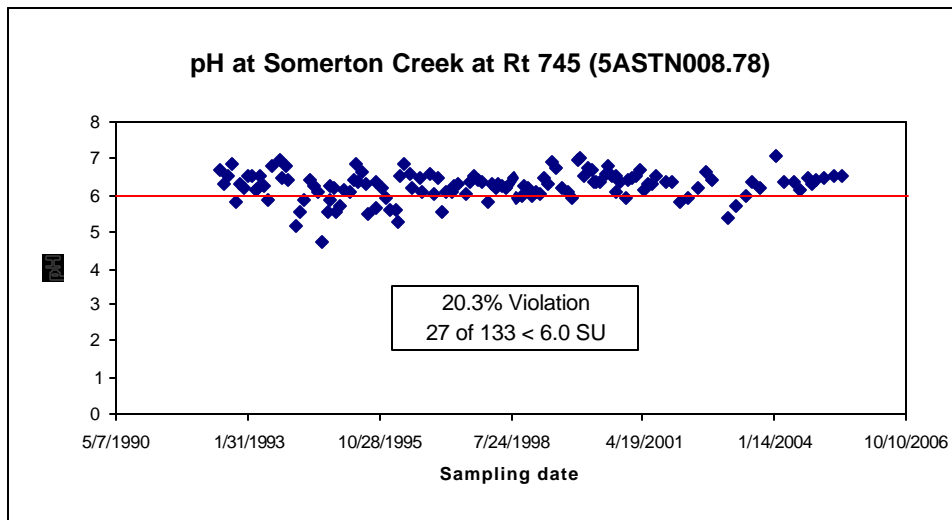
This report presents the assessment of whether low pH in the Somerton Creek watershed is due to natural conditions or whether a Total Maximum Daily Load (TMDL) must be performed because of anthropogenic impacts. Somerton Creek is located in the City of Suffolk in the Chowan River and Dismal Swamp Basins (USGS Hydrologic Unit Code 03010203). The waterbody identification code (WBID) for Somerton Creek is VAT-K38R. There are 16.2 total stream miles in the Somerton Creek watershed (National Hydrography Dataset (NHD)).

The drainage area of the Somerton Creek watershed is approximately 91.2 square miles. The average annual rainfall recorded at Holland, VA is 48.76 inches. The watershed is approximately 58,362 acres in size, and is predominately forested (39.4 percent) and agricultural (40.4 percent). The agricultural area includes 31.9 percent row crop and 8.5 percent pasture/hay land. Residential, commercial, and industrial areas compose approximately 1.95 percent of the land base. Other uses in the watershed are comprised of 0.2 percent open water, 1.9 percent transitional areas, 15.7 percent woody wetlands, and 0.3 percent herbaceous area.

The pH impaired segment is 13.78 stream miles of mainstem Somerton Creek from 5 miles upstream of the Route 745 bridge to the VA/NC state line. An assessment of low dissolved oxygen (DO) due to natural conditions has been performed on the Somerton Creek watershed in a separate document.

Somerton Creek was listed as impaired on Virginia's 2002 303(d) Report on Impaired Waters, and the 2004 305(b) / 303(d) Integrated Report (VADEQ, 2003, 2004) due to violations of the State's water quality standard for dissolved oxygen and pH. VADEQ collected a total of 133 pH data points, with 27 water quality standard violations (20.3%) at station 5ASTN008.78 from June 30, 1992 through June 9, 2005 (see Figure E1).

**Figure E1. Time series of pH values (station 5ASTN008.78), June 1992 through June 2005.**



According to Virginia Water Quality Standards (9 VAC 25-260-10A), "all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)."

As indicated above, Somerton Creek must support all designated uses and meet all applicable criteria. The Somerton Creek does not appear to support aquatic life use because of pH water quality standard violations.

VADEQ proposes a methodology for determining whether low pH originates from natural or anthropogenic sources, adapted from "Methodology for Assessing Natural Dissolved Oxygen and pH Impairments: Application to the Rosier Creek Watershed, Virginia." (MapTech 2003) This report will be used to determine if the pH impairments are natural and if Somerton Creek can be reclassified as Class VII Swamp Waters.

The level of acidity as registered by pH in a water body is determined by a balance between organic acids produced by decay of vegetative material and buffering capacity. Conditions in a stream that would typically be associated with naturally low pH include slow-moving, rippleless waters or wetlands where the bacterial decay of organic matter produces organic acid. Indicators of these conditions include low slope, the presence of wetlands, and often low pH due to organic acids (tannins, humic and fulvic substances) produced in the decay process.

These situations can be compounded by anthropogenic activities that contribute excessive nutrients or readily available organic matter to these systems. The general approach to determine if DO and pH impairments in streams are due to natural conditions is to assess a series of water quality and hydrologic criteria to determine the likelihood of an anthropogenic source. A logical 4-step process for identifying natural conditions that result in low DO and/or pH levels and for determining the likelihood of anthropogenic impacts that will exacerbate the natural condition is described below.

- Step 1. Determine slope and appearance (presence of wetlands).
- Step 2. Determine nutrient levels and compare with USGS background concentrations.
- Step 3. Determine degree of seasonal fluctuation (for DO only).
- Step 4. Determine anthropogenic impacts from permitted dischargers and land use.

Before implementing this procedure for low pH, all pH data should be screened for flows less than the 7Q10. pH data collected on days when flow was less than the 7Q10 should be eliminated from the data set and the violation rate recalculated accordingly. One data point in the Somerton Creek pH data set occurred on a day when the 7Q10 was below 0.12 cfs. This data point was eliminated from the data set.

Somerton Creek from rivermile 13.78 downstream to the VA/NC border at rivermile 0.00 exhibits a low slope (0.01%) and large areas of forested land with swamps and heavy tree canopy. Decomposition of large inputs of decaying vegetation, from areas of forested land with swamps and heavy tree canopy throughout the watershed, increases the acidity and lowers the pH of the stream. These are not considered anthropogenic impacts.

Somerton Creek exhibits low nutrient concentrations at or below national background levels in streams from undeveloped areas, which are not indicative of human impact.

There are no permitted dischargers in the Somerton Creek watershed. Residential / Commercial land use (1.95%) probably has minimal pH effect on streams in the watershed.

Based on the above information, a change in the water quality standards classification to Class VII Swamp Waters due to natural conditions, rather than a TMDL, is indicated for Somerton Creek and tributaries from rivermile 13.78 downstream to rivermile 0.00 at the VA/NC border, totaling 13.78 stream miles. If there is a 305(b)/303(d) assessment prior to the reclassification, Somerton Creek will be assessed as Category 4C, Impaired due to natural condition, no TMDL needed.

VADEQ performed the assessment of the Somerton Creek low pH natural conditions in lieu of a TMDL. Therefore, neither a TMDL Technical Advisory Committee (TAC) meeting nor a public meeting was involved. Public participation will occur during the next water quality standards triennial review process.

## 1. INTRODUCTION

Somerton Creek was listed as impaired on Virginia's 2002 303(d) Report on Impaired Waters, and the 2004 305(b) / 303(d) Integrated Report (VADEQ, 2003, 2004) due to violations of the State's water quality standard for dissolved oxygen and pH. This report evaluates the pH impairment by determining if natural conditions are the cause of the impairment, thus obviating the need for a TMDL. The DO impairment has been addressed separately from this document.

A glossary of terms used throughout this report is presented as Appendix A.

## 2. PHYSICAL SETTING

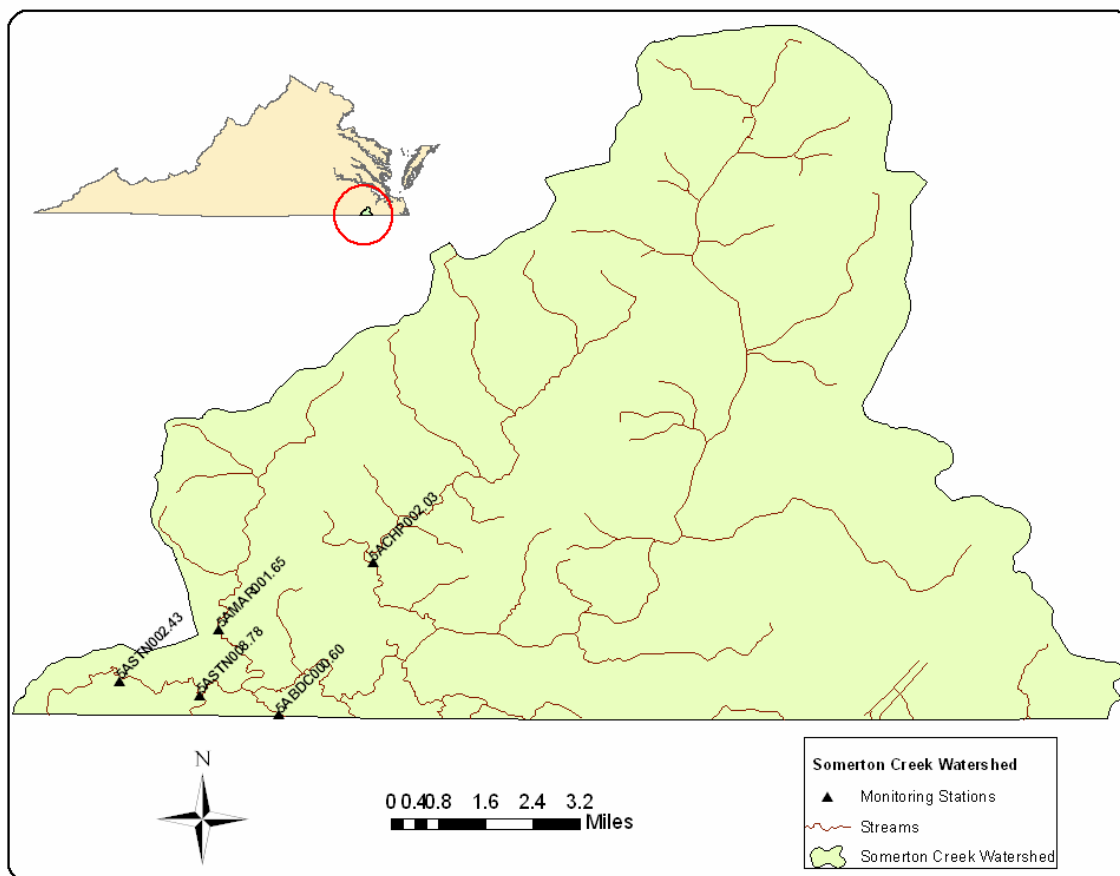
### 2.1 Listed Water Bodies

Somerton Creek is located in the City of Suffolk in the Chowan River and Dismal Swamp Basins (USGS Hydrologic Unit Code 03010203). The waterbody identification code (WBID) for non-tidal Somerton Creek is VAT-K38R. There are 16.2 total stream miles in the Somerton Creek watershed (National Hydrography Dataset (NHD)). The impaired segment is 13.78 stream miles of mainstem Somerton Creek. This report addresses only the pH impairment. The DO impairment is reported in a separate document. The segment is described in Table 1 and Figure 1.

**Table 1. Impaired segment description (Somerton Creek).**

<b>Segment (segment ID)</b>	<b>Impairment (source of impairment)</b>	<b>Upstream Limit Description</b>	<b>Downstream Limit Description</b>	<b>Miles Affected</b>
Somerton Creek VAT-K38R-01	pH Dissolved Oxygen (Natural Conditions)	5.0 miles upstream of Route 745 bridge	VA/NC state line	13.78

**Figure 1. Map of the Somerton Creek study area.**



## **2.2. Watershed**

### **2.2.1. General Description**

Somerton Creek, located within the city of Suffolk Virginia, is a tributary to the Chowan River in North Carolina. It is approximately 16.2 miles long and flows west from its headwaters near the towns of Somerton and Whaleyville, VA to its confluence with the Chowan River in North Carolina. The watershed has an area of approximately 91.2 square miles. There is no continuous flow gaging station on Somerton Creek, however there is a USGS gage (#02049500) on the Blackwater River near Franklin, VA, with a drainage area of 617 mi<sup>2</sup>.

### **2.2.2. Geology, Climate, Land Use**

#### **Geology and Soils**

Somerton Creek is in the Atlantic Coastal Plain physiographic region. The Atlantic Coastal Plain is the easternmost of Virginia's physiographic provinces. The Atlantic Coastal Plain extends from New Jersey to Florida, and includes all of Virginia east of the Fall Line. The Fall Line is the easternmost extent of rocky river rapids, the point at which east-flowing rivers cross from the hard, igneous and metamorphic rocks of the Piedmont to the relatively soft, unconsolidated strata of the Coastal Plain. The Coastal Plain is underlain by layers of Cretaceous and younger clay, sand, and gravel that dip gently eastward. These layers were deposited by rivers carrying sediment from the eroding Appalachian Mountains to the west. As the sea level rose and fell, fossiliferous marine deposits were interlayered with fluvial, estuarine, and

beach strata. The youngest deposits of the Coastal Plain are sand, silt and mud presently being deposited in our bays and along our beaches (<http://www.geology.state.va.us/DOCS/Geol/coast.html>).

Soils for the Somerton Creek watershed were documented utilizing the Natural Resources Conservation Service Web Soil Survey(<http://websoilsurvey.nrcs.usda.gov>). Three general soil types were identified using this survey; the Levy series, the Nansemond series, and the Pactolus series. Descriptions of these soil series were derived from queries to the USDA Natural Resources Conservation Service (NRCS) Official Soil Series Description web site (<http://ortho.ftw.nrcs.usda.gov/cgi-bin/osd/osdname.cgi>).

The soils of the Levy series are very deep, poorly drained soils. These soils are located on marshes and in the floodplains of the lower Atlantic Coastal Plain. This series is primarily formed from fluvial sediments. The soils are typically silty clay and silty clay loam and permeability of these soils is very slow. The Levy series was formerly mapped as either swamp or fresh water marsh.

The soils of the Nansemond series are very deep and moderately well drained. Permeability is moderately rapid. These soils are located on marine terraces and stream terraces of the Atlantic Coastal Plain. The soils formed from parent materials consisting of alluvium and marine deposits. This series typically consists of fine sandy loam soils.

The Pactolus series are very deep soils consisting of sand to loamy sand. Drainage is moderately well to somewhat poor and permeability is rapid. This soil series was formed from sandy fluvial and marine sediments on Coastal Plain stream and marine terraces.

In the watershed, small percentages of other soil series were also found which include Kenansville, Rains, Alaga, Tetotum, Tomotley, Wahee, Dogue, Dragston, and Goldsboro series.

### ***Climate***

The climate summary for Somerton Creek comes from a weather station located in Holland, VA (Station #444044, Southeast Regional Climate Center, [http://www.sercc.com/climateinfo/historical/historical\\_va.html](http://www.sercc.com/climateinfo/historical/historical_va.html)) with a period of record from 8/1/1948 to 3/31/2004 (Table 2). The average annual maximum and minimum temperature (°F) at the weather station are 69.9 and 47.2, respectively. The average annual precipitation is 48.76 inches.

**Table 2. Climate summary for Holland, Virginia (Station #444044).**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
<b>Average Max. Temperature (°F)</b>	49.5	52.2	60.0	70.2	77.9	85.0	88.4	86.9	81.5	71.9	62.8	52.8	<b>69.9</b>
<b>Average Min. Temperature (°F)</b>	28.3	30.4	36.8	45.1	54.5	62.6	67.2	65.6	59.3	47.4	38.8	30.9	<b>47.2</b>
<b>Average Total Precipitation (in.)</b>	3.95	3.46	4.0	3.25	3.99	4.09	5.51	5.77	4.52	3.70	3.13	3.40	<b>48.76</b>

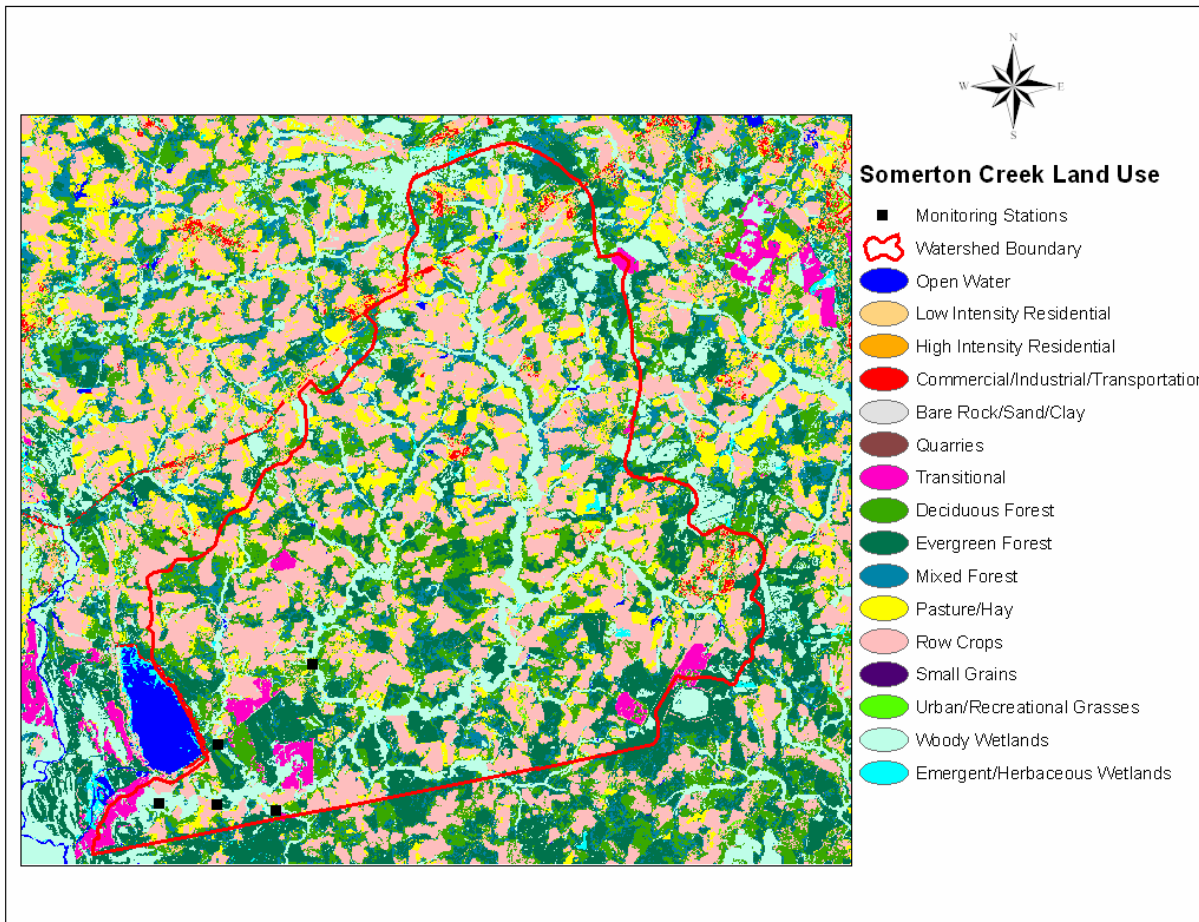
### ***Land Use***

The Somerton Creek watershed extends approximately 16.2 miles upstream from the VA/NC state line to its headwaters near the towns of Somerton and Whaleyville, VA. The watershed is approximately 58,362 acres in size and is predominately forested (39.4) and agricultural (40.4 percent). The agricultural area includes 31.9 percent row crop and 8.5 percent pasture/hay land. Residential, commercial, and industrial areas compose approximately 1.95 percent of the land base. Other uses in the watershed are comprised of 0.2 percent open water, 1.9 percent transitional areas, 15.7 percent woody wetlands, and 0.3 percent herbaceous area. Land use is described in Table 3. A map of the distribution of land use in the

watershed (Figure 2) shows that agriculture and forest land cover the majority of the watershed with little to no urban land present.

**Table 3. Land use in the Somerton Creek watershed.**

<b>Landuse</b>	<b>Acres</b>	<b>Percent of Total</b>
Open Water	117.87	0.20
Low Intensity Residential	740.57	1.27
High Intensity Residential	0.44	0.17
Commercial/Industrial/Transportation	396.75	0.68
Bare Rock/Sand/Clay	0.0	0.00
Quarries/Strip Mines/Gravel Pits	0.22	0.00
Transitional	1120.87	1.92
Deciduous Forest	8968.07	15.37
Evergreen Forest	9084.61	15.57
Mixed Forest	4921.82	8.43
Pasture/Hay	4951.62	8.48
Row Crops	18642.91	31.94
Other Grasses (Urban/recreational; e.g. parks)	78.28	0.13
Woody Wetlands	9144.21	15.67
Emergent/Herbaceous Wetlands	193.48	0.33
TOTAL:	58362	100
	91.2 sq. miles	

**Figure 2. Land use in the Somerton Creek watershed.**

### 3. DESCRIPTION of WATER QUALITY PROBLEM / IMPAIRMENT

Somerton Creek was listed as impaired on Virginia's 2002 303(d) Report on Impaired Waters, and the 2004 305(b) / 303(d) Integrated Report (VADEQ, 2003, 2004) due to violations of the State's water quality standard for dissolved oxygen and pH.

VADEQ obtained a total of 133 pH data points, with 27 violations (20.3%) below the lower water quality pH standard of 6 SU at station 5ASTN008.78 (see Figure 1) from June 30, 1992 through June 9, 2005 (Table 4).

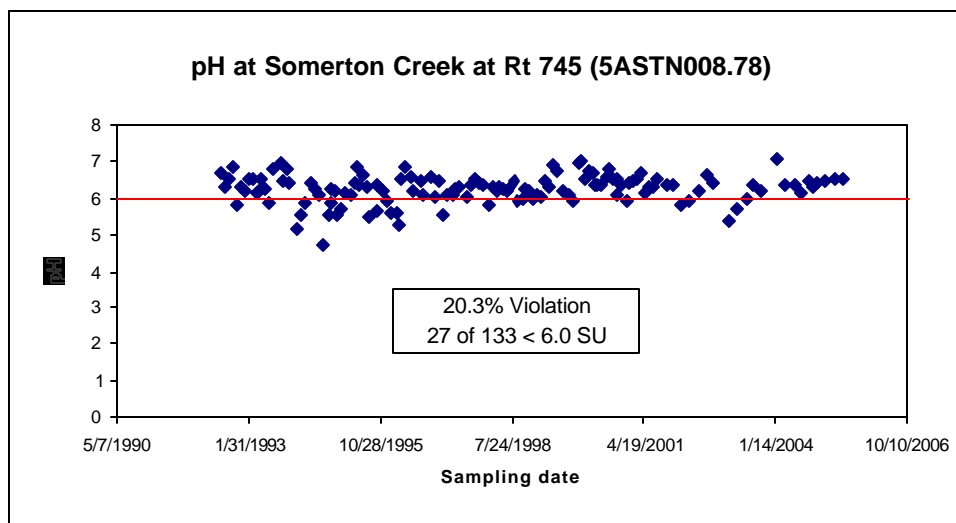
**Table 4. pH data collected by VADEQ on Somerton Creek at Rt 745, 5ASTN008.78.**

Station	Date of First Sample	Date of Last Sample	Number of Samples	Average SU	Minimum SU	Maximum SU	Number of Violations
5ASTN008.78	6/30/92	6/9/05	133	6.26	4.73	7.05	27

A time series graph of all data collected at station 5ASTN008.78 shows the pH values ranging from 4.73 SU to 7.05 SU (Figure 3). From January 1992, pH measurements were collected using electronic field

probe meters. The horizontal line at the pH = 6.0 SU mark represents the minimum water quality standard. The data points below the pH = 6.0 SU line illustrate violations of the water quality standard.

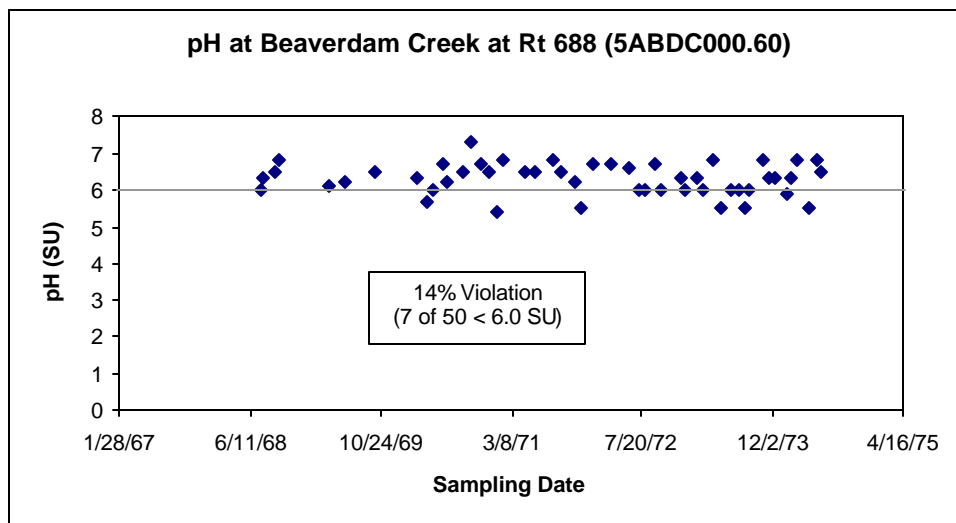
**Figure 3. Time series of pH values at Somerton Creek at Rt 745, 5ASTN008.78.**

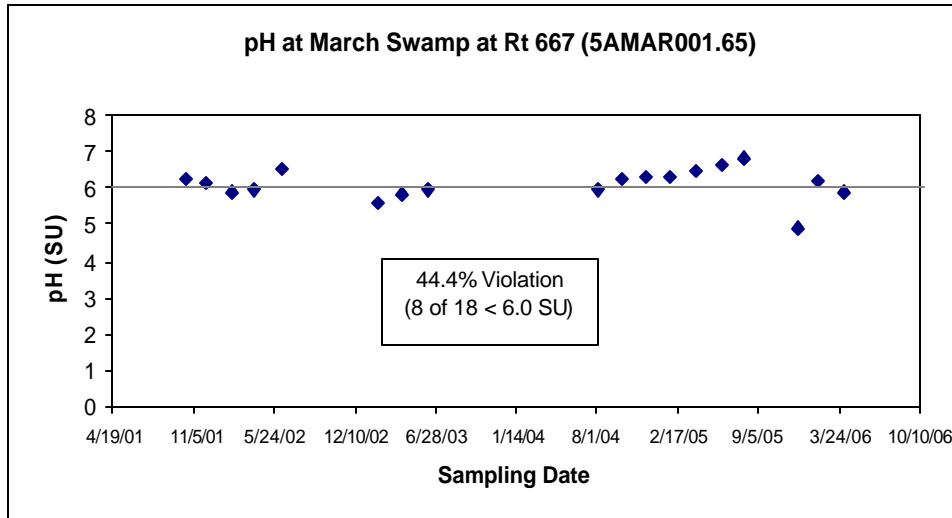
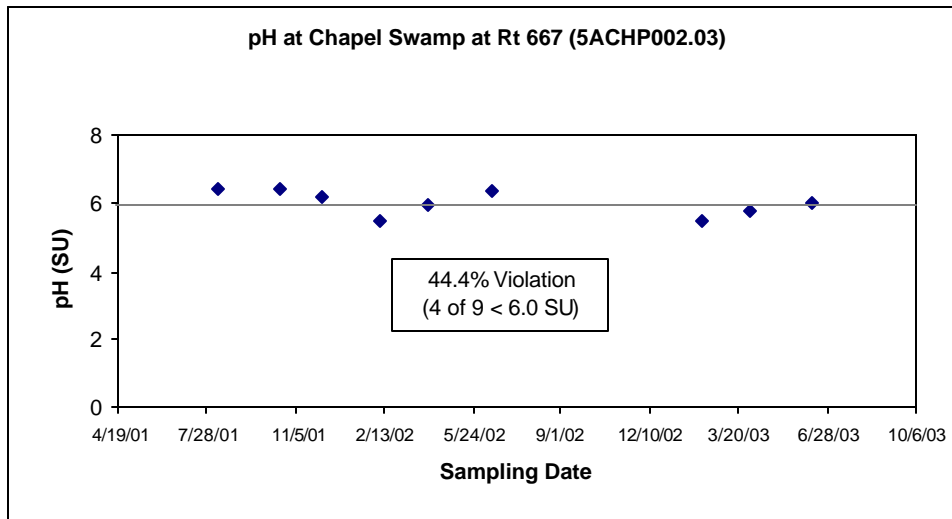


### 3.1 Associated Mainstem and Tributary site pH

VADEQ has three associated tributary monitoring stations in the Somerton Creek watershed that contain pH data. Associated station pH data are presented in Figures 4 - 6 below.

**Figure 4. pH values at Beaverdam Creek, 5ABDC000.60.**



**Figure 5. pH values at March Swamp, 5AMAR001.65.****Figure 6. pH values at Chapel Swamp, 5ACHP002.03.**

#### 4. WATER QUALITY STANDARD

According to Virginia Water Quality Standards (9 VAC 25-260-5), the term “water quality standards means provisions of state or federal law which consist of a designated use or uses for the waters of the Commonwealth and water quality criteria for such waters based upon such uses. Water quality standards are to protect the public health or welfare, enhance the quality of water and serve the purposes of the State Water Control Law (§62.1-44.2 et seq. of the Code of Virginia) and the federal Clean Water Act (33 USC §1251 et seq.).”

As stated above, Virginia water quality standards consist of a designated use or uses and a water quality criteria. These two parts of the applicable water quality standard are presented in the sections that follow.

##### 4.1. Designated Uses

According to Virginia Water Quality Standards (9 VAC 25-260-10A), “all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a

*balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)."*

As stated above, Somerton Creek must support all designated uses and meet all applicable criteria.

## 4.2. Applicable Water Quality Standard

The applicable water quality standard for pH in the Somerton Creek watershed is a minimum pH of 6.0 SU and a maximum pH of 9.0 SU.

**Table 5. Applicable water quality standards.**

Parameter	Minimum, mg/l	Maximum, mg/l
<i>pH</i>	6.0 SU	9.0 SU

If the waterbody exceeds the criterion listed above in more than 10.5 percent of samples, the waterbody is classified as impaired and natural conditions must be determined or a TMDL must be developed and implemented to bring the waterbody into compliance with the water quality criterion.

## 5. ASSESMENT of NATURAL CONDITIONS AFFECTING LOW pH - Process for determining if DO and pH impairments in free-flowing streams are due to natural conditions.

The level of acidity as registered by pH in a water body is determined by a balance between organic acids produced by decaying vegetative material and buffering capacity. Conditions in a stream that would typically be associated with naturally low DO and pH include slow-moving, ripple-less waters or wetlands where the decay of organic matter produces organic acids. These situations can be compounded by anthropogenic activities that contribute excessive nutrients or readily available organic matter to these systems. The general approach to determine if DO and pH impairments in streams are due to natural conditions is to assess a series of water quality and hydrologic criteria to determine the likelihood of an anthropogenic source. A logical 4-step process for identifying natural conditions that result in low DO and/or pH levels and for determining the likelihood of anthropogenic impacts that will exacerbate the natural condition is described below.

- Step 1. Determine slope and appearance.
- Step 2. Determine nutrient levels.
- Step 3. Determine degree of seasonal fluctuation (for DO only).
- Step 4. Determine anthropogenic impacts.

**The results from this methodology (or process or approach) will be used to determine if Somerton Creek should be reclassified as Class VII Swamp Waters. Each step is described in detail below.**

# Procedure for Natural Condition Assessment of low pH and low DO in Virginia Streams

Prepared by Virginia Department of Environmental Quality  
October 2004

## I. INTRODUCTION

Virginia's list of impaired waters currently shows many waters as not supporting the aquatic life use due to exceedances of pH and/or DO criteria that are designed to protect aquatic life in Class III waters. However, there is reason to believe that most of these streams or stream segments have been misclassified and should more appropriately be classified as Class VII Swamp Waters. This document presents a procedure for assessing if natural conditions are the cause of the low pH and/or low DO levels in a given stream or stream segment.

The level of dissolved oxygen (DO) in a water body is determined by a balance between oxygen-depleting processes (e.g., decomposition and respiration) and oxygen-restoring processes (e.g., aeration and photosynthesis). Certain natural conditions promote a situation where oxygen-restoring processes are not sufficient to overcome the oxygen-depleting processes. The level of acidity as registered by pH in a water body is determined by a balance between organic acids produced by decay of vegetative material, and buffering capacity.

Conditions in a stream that would typically be associated with naturally low DO and/or naturally low pH include slow-moving, ripple-less waters. In such waters, the decay of organic matter depletes DO at a faster rate than it can be replenished and produces organic acids (tannins, humic and fulvic substances). These situations can be compounded by anthropogenic activities that contribute excessive nutrients or readily available organic matter to these systems.

The general approach to determine if DO and pH impairments in streams are due to natural conditions is to assess a series of water quality and hydrologic criteria to determine the likelihood of an anthropogenic source. A logical 4-step process for identifying natural conditions that result in low DO and/or pH levels and for determining the likelihood of anthropogenic impacts that will exacerbate the natural condition is described below. VADEQ staff is proposing to use this approach to implement State Water Control Law 9 VAC 25-260-55, Implementation Procedure for Dissolved Oxygen Criteria in Waters Naturally Low in Dissolved Oxygen.

Waters that are shown to have naturally low DO and pH levels will be reclassified as Class VII Swamp Waters, with the associated pH criterion of 4.3 to 9.0 SU. An associated DO criterion is currently being developed from swamp water data. A TMDL is

is not needed for these waters. An assessment category of 4C will be assigned until the waterbody has been reclassified.

## **II. NATURAL CONDITION ASSESSMENT**

Following a description of the watershed (including geology, soils, climate, and land use), a description of the DO and/or pH water quality problem (including a data summary, time series and monthly data distributions), and a description of the water quality criteria that were the basis for the impairment determination, the available information should be evaluated in four steps.

### Step 1. Determine appearance and flow/slope.

Streams or stream segments that have naturally low DO (< 4 mg/L) and low pH (< 6 SU) are characterized by very low slopes and low velocity flows (flat water with low reaeration rates). Decaying vegetation in such swampy waters provides large input of plant material that consumes oxygen as it decays. The decaying vegetation in swamp water also produces acids and decreases pH. Plant materials contain polyphenols such as tannin and lignin. Polyphenols, and partially degraded polyphenols, build up in the form of tannic acids, humic acids, and fulvic acids that are highly colored. The trees of swamps have higher polyphenolic content than the soft-stemmed vegetation of marshes. Swamp streams (blackwater) are therefore more highly colored and more acidic than marsh streams.

Appearance and flow velocity (or slope if flow velocity is not available) must be identified for each stream or stream segment to be assessed for natural conditions and potential reclassification as a Class VII Swamp Water. This can be done through maps, photos, field measurements or other appropriate means.

### Step 2. Determine nutrient levels.

Excessive nutrients can cause a decrease in DO in relatively slow moving systems, where aeration is low. High nutrient levels are an indication of anthropogenic inputs of nitrogen, phosphorus, and possibly organic matter. Nutrient input can stimulate plant growth, and the resulting die-off and decay of excessive plankton or macrophytes can decrease DO levels.

USGS (1999) estimated national background nutrient concentrations in streams and groundwater from undeveloped areas. Average nitrate background concentrations are less than 0.6 mg/L for streams, average total nitrogen (TN) background concentrations are less than 1.0 mg/L, and average background concentrations of total phosphorus (TP) are less than 0.1 mg/L.

Nutrient levels must be documented for each stream or stream segment to be assessed for natural conditions and potential reclassification as a Class VII Swamp Water. Streams with average concentrations of nutrients greater than the national background concentrations should be further evaluated for potential impacts from anthropogenic sources.

### Step 3. Determine degree of seasonal fluctuation (for DO only).

Anthropogenic impacts on DO will likely disrupt the typical seasonal fluctuation seen in the DO concentrations of wetland streams. Seasonal analyses should be conducted for each potential Class VII stream or stream segment to verify that DO is depressed in the summer months and recovers during the winter, as would be expected in natural systems. A weak seasonal pattern could indicate that human inputs from point or nonpoint sources are impacting the seasonal cycle.

### Step 4. Determine anthropogenic impacts.

Every effort should be made to identify human impacts that could exacerbate the naturally low DO and/or pH. For example, point sources should be identified and DMR data analyzed to determine if there is any impact on the stream DO or pH concentrations. Land use analysis can also be a valuable tool for identifying potential human impacts.

Lastly, a discussion of acid rain impacts should be included for low pH waters. The format of this discussion can be based either on the process used for the recent Class VII classification of several streams in the Blackwater watershed of the Chowan Basin (letter from VADEQ to EPA, 14 October 2003). An alternative is a prototype regional stream comparison developed for Fourmile Creek, White Oak Swamp, Matadequin Creek and Mechumps Creek (all east of the fall line).

### 7Q10 Data Screen

If the data warrant it, a data screen should be performed to ensure that the impairment was identified based on valid data. All DO or pH data that violate water quality standards should be screened for flows less than the 7Q10. Data collected on days when flow was < 7Q10 should be eliminated from the data set and the violation rate recalculated accordingly. Only those waters with violation rates determined days with flows > or = 7Q10 flows should be classified as impaired.

In some cases, data were collected when flow was 0 cfs. If the 7Q10 is identified as 0 cfs as well, all data collected under 0 cfs flow would need to be considered in the water quality assessment. In those cases, the impairment should be classified as 4C, Impaired due to natural conditions, no TMDL needed. However, a reclassification to Class VII may not always be appropriate.

## **III. NATURAL CONDITION CONCLUSION MATRIX**

The following decision process should be applied for determining whether low pH and/or low DO values are due to natural conditions and justify a reclassification of a stream or stream segment as Class VII Swamp Waters.

If velocity is low or if slope is low (<0.50%) AND  
If wetlands are present along stream reach AND  
If no point sources or only point sources with minimal impact on DO and pH AND

If nutrients are < typical background

- ❖ average (= assessment period mean) nitrate less than 0.6 mg/L
- ❖ average total nitrogen (TN) less than 1.0 mg/L, and
- ❖ average total phosphorus (TP) are less than 0.1 mg/L AND

For DO: If seasonal fluctuation is normal AND

For pH: If nearby streams without wetlands meet pH criteria OR if no correlation between in-stream pH and rain pH,

THEN determine as impaired due to natural conditions

→ assess as category 4C in next assessment

→ initiate WQS reclassification to Class VII Swamp Waters

→ get credit under consent decree

The analysis must state the extent of the natural condition based on the criteria outlined above. A map showing land use, point sources, water quality stations and, if necessary, the delineated segment to be classified as swamp water should be included.

In cases where not all of these criteria apply, a case by case argument must be made based on the specific conditions in the watershed.

### **5.1 Preliminary Data Screen for Low Flow 7Q10**

The 7Q10 flow of a stream is the lowest streamflow for seven consecutive days that occurs on average once every ten years. The first step for low flow 7Q10 screening is to determine the most accurate 7Q10 available. There is no long-term flow gaging station in the Somerton Creek basin.

The 7Q10 flows for the Somerton Creek pH station may be estimated by a drainage area comparison between 5ASTN008.78 and the drainage area and 7Q10 flow at the Blackwater River near Franklin, VA gaging station (USGS #02049500) located 14.5 miles northwest of 5ASTN008.78. The 7Q10 for Blackwater River near Franklin was used with a drainage area ratio with the pH site, yielding a 7Q10 flow of 0.12 cfs at 5ASTN008.78.

The pH Instantaneous Water Quality Standard applies **AT** 7Q10 flow, but **NOT** below 7Q10 flow (9 VAC 25-260-50 \*\*\*). Therefore in streams where the 7Q10 > 0.12 cfs, pH less than 6.0 SU taken at flows below 7Q10 are not water quality standard violations. However, in streams where the 7Q10 = 0.0 cfs, **ALL** pH data < 6.0 SU are standard violations, even if the flow = 0 cfs when the pH was taken.

At station 5ASTN008.78 on Somerton Creek, flow was less than the 7Q10 of 0.12 cfs for 5 days in September and October 1993; 5 days in July 1994, and 8 days in July 2002. During this time period, one pH measurement was recorded, and one data point was eliminated from the data set.

### **5.2 Low Slope, Swamps, Wetlands or Large Forested Areas**

There were no discharge measurements made at the Rt. 745 bridge, 5ASTN008.78, the original 303(d) listing station. The hydrologic slope from the 20 ft. topographic contour at rivermile 13.78, located 5 mi upstream of the Rt. 745 bridge, downstream to the 13 ft. topographic contour at rivermile 0.00, located at the VA/NC state line is estimated at 0.01%, which is considered low slope. These locations comprise the approximate upstream and downstream boundaries of this low slope segment on mainstem Somerton Creek. The low slope in this 13.78 mile segment contributes no human impact. This low slope segment encompasses about 85% of the Somerton Creek reach from its headwaters to the VA/NC border. Decomposition of the large inputs of vegetation from areas of forested land with swamps and heavy tree canopy throughout the watershed increase the acidity in the stream as lowers the pH. These are not considered anthropogenic impacts.

Visual inspections from bridges at Rts. 745, 759, and 660 revealed large swamp areas with heavy tree canopy. There are large inputs of decaying vegetation from areas of forested land with heavy tree canopy throughout the watershed. (Figures 7-10).

**Figure 7. Somerton Creek at Rt 745, May 2006.**



**Figure 8. Somerton Creek at Rt. 745 May 2006.**



**Figure 9. Somerton Creek at Rt 759, May 2006.**



**Figure 10. Somerton Creek at Rt 660, May 2006.**



### 5.3 Instream Nutrients

The VADEQ collected nutrient data from station 5ASTN008.78 from June 1992 to June 2005. The average nutrient concentrations are below the USGS (1999) national background nutrient concentrations in streams from undeveloped areas levels of nitrate  $\leq 0.6$  mg/l; TN (TKN + NO<sub>3</sub> + NO<sub>2</sub>)  $\leq 1.0$  mg/l; and TP  $\leq 0.1$  mg/l (Table 6). While average TP and TN are just below the USGS background levels, the watershed is predominately forested and wetlands (55.4 percent), with agricultural landuse dispersed in row crops evenly throughout the watershed at 31.9 percent. These low nutrient levels are not indicative of human impact.

**Table 6. Instream nutrients of Somerton Creek, 5ASTN008.78**

Parameter	Average Conc.	Background	Number
<b>Total Phosphorus</b>	<b>0.097 mg/l</b>	<0.1 mg/L	(n=135)
Orthophosphorus	0.03 mg/l		(n=2)
Total Kjeldahl Nitrogen	0.74 mg/l		(n=123)
Ammonia as N	0.05 mg/l		(n=123)
<b>Nitrate as N</b>	<b>0.12 mg/l</b>	<0.6 mg/L	(n=123)
<b>TN (TKN + NO<sub>3</sub> + NO<sub>2</sub>)</b>	<b>0.93 mg/l</b>	<1.0mg/L	(n=12)

### 5.4 Impact from Point Source Dischargers and Land Use

There are no permitted point source discharges in the Somerton Creek watershed.

Residential and high use industrial areas compose less than 2.0 percent of the land base, an insignificant portion of the watershed. The watershed is predominately forested and wetlands (55.4 percent), with less than 1.0 percent open water. This land use was considered not indicative of human impact.

### 5.5 Human Impact from Acid Deposition

Acid deposition is expected to occur in the Somerton Creek watershed, however, rainfall pH data are difficult to collect and do not exist near Somerton Creek. The closest available rainfall pH data come from the National Atmospheric Deposition Program/NTN station in Prince Edward County, VA (Station VA24). Acid deposition occurred in the Prince Edward dataset, with weekly rainfall pH during the period from 1999-2005 averaging 4.50 SU (SE 0.02, n=219) with a minimum of 3.76 SU and maximum of 5.51 SU. (<http://nadp.sws.uiuc.edu>) According to an EPA website (<http://www.epa.gov/airmarkets/acidrain/index.html>) the natural pH of rain is approximately 5.5 SU.

One method to assess whether acid deposition adversely impacts low pH in a waterbody is to compare daily precipitation data from the Virginia State Climatology Office to DEQ ambient water quality monitoring field pH data. During the last DEQ water quality standards triennial review in 2003, DEQ filtered daily rainfall data for 1996 - 2003 according to water sample collection dates at DEQ ambient water quality monitoring stations that were within an approximate 15-mile radius of precipitation monitoring stations. Precipitation amounts and field pH values were graphed together and correlation factors calculated. The only discernable pattern was a general negative correlation of precipitation to pH and the majority of r-values were well below 0.5, which does not indicate a close correlation between the variables. This comparison is described in correspondence to USEPA Region III dated October 14, 2003 in Appendix B. However, the extent to which stream pH is decreased by acid deposition in Virginia cannot be decisively established. Significant human impact from acid deposition is inconclusive.

## 6. CONCLUSION

***The following decision process is proposed for determining whether low pH values are due to natural conditions:***

If slope is low (<0.50) AND

If wetlands or large areas of forested land are present along stream reach AND

If no point sources or point sources with minimal impact on pH AND

If nutrients are < typical background

❖ average (= assessment period mean) nitrate less than 0.6 mg/L

❖ average total nitrogen (TN) less than 1.0 mg/L, and

❖ average total phosphorus (TP) are equal to or less than 0.1 mg/L AND

If nearby streams without wetlands meet pH criteria,

THEN determine as impaired due to natural conditions

→ assess as category 4C in next assessment

→ initiate WQS reclassification to Class VII Swamp Waters

→ get credit under consent decree

Somerton Creek from rivermile 13.78 downstream to the VA/NC state line exhibits low slope (0.01%) and has large areas of forested land with swamps and heavy tree canopy. Decomposition of the large inputs of decaying vegetation from areas of forested land with swamps and heavy tree canopy throughout the watershed produce organic acids and lower pH in the stream. These are not considered anthropogenic impacts.

Somerton Creek exhibits low nutrient concentrations at or below national background levels in streams from undeveloped areas, which not indicative of human impact.

There are no permitted dischargers in the Somerton Creek watershed. Residential and Commercial land use (<2.0%) probably has no effect on pH in the mainstem or tributary swampy areas.

There is not a close correlation between precipitation amounts and field pH at DEQ ambient water quality monitoring stations. The only discernable pattern has been a general negative correlation of precipitation to pH and the majority of r-values were well below 0.5, which does not indicate a close correlation between the variables. However the extent to which stream pH is decreased by acid deposition cannot be conclusively determined.

Based on the above information, a change in the water quality standards classification to Class VII Swamp Waters due to natural conditions, rather than a TMDL, is indicated for Somerton Creek and tributaries from rivermile 13.78 downstream to the VA/NC state line. If there is a 305(b)/303(d) assessment prior to the reclassification, Somerton Creek will be assessed as Category 4C: Impaired due to natural conditions, no TMDL needed.

## **7. PUBLIC PARTICIPATION**

VADEQ performed the assessment of the Somerton Creek low pH natural condition in lieu of a TMDL. Therefore neither a TMDL Technical Advisory Committee (TAC) meeting nor a public meeting was involved. Public participation will occur during the next water quality standards triennial review process.

## **8. REFERENCES**

Maptech, Methodology for Assessing Natural Dissolved Oxygen and pH Impairments: Application to the Rosier Creek Watershed, Virginia. 2003.

National Atmospheric Deposition Program. <http://nadp.sws.uiuc.edu>.

SRCC (Southeast Regional Climate Center)

[http://www.dnr.state.sc.us/climate/sercc/products/historical/historical\\_va.html](http://www.dnr.state.sc.us/climate/sercc/products/historical/historical_va.html)

USEPA (United States Environmental Protection Agency). Clean Air Markets – Environmental Issues.

<http://www.epa.gov/airmarkets/acidrain/index.html>

USGS (United States Geological Survey), National Background Nutrient Concentrations in Streams from

Undeveloped Areas. 1999.

VADEQ (Virginia Department of Environmental Quality), Virginia 2002 303(d) Report on Impaired Waters. 2003.

VADEQ (Virginia Department of Environmental Quality), Virginia Water Quality Assessment 305(b) / 303(d) Integrated Report. 2004.

## **Appendix A**

### **Glossary**

## GLOSSARY

**Note:** All entries in italics are taken from USEPA (1998). All non-italicized entries are taken from MapTech (2002).

**303(d).** A section of the Clean Water Act of 1972 requiring states to identify and list water bodies that do not meet the states' water quality standards.

**7Q10.** The lowest streamflow for seven consecutive days that occurs on average once every ten years.

***Ambient water quality.*** Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact on human health.

***Anthropogenic.*** Pertains to the [environmental] influence of human activities.

***Background levels.*** Levels representing the chemical, physical, and Bacterial conditions that would result from natural geomorphological processes such as weathering or dissolution.

***Best management practices (BMPs).*** Methods, measures, or practices determined to be reasonable and cost-effective means for a landowner to meet certain, generally nonpoint source, pollution control needs. BMPs include structural and nonstructural controls and operation and maintenance procedures.

***Clean Water Act (CWA).*** The Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972), Public Law 92-500, as amended by Public Law 96-483 and Public Law 97-117, 33 U.S.C. 1251 et seq. The Clean Water Act (CWA) contains a number of provisions to restore and maintain the quality of the nation's water resources. One of these provisions is section 303(d), which establishes the TMDL program.

***Concentration.*** Amount of a substance or material in a given unit volume of solution; usually measured in milligrams per liter (mg/L) or parts per million (ppm).

***Confluence.*** The point at which a river and its tributary flow together.

***Contamination.*** The act of polluting or making impure; any indication of chemical, sediment, or Bacterial impurities.

***Designated uses.*** Those uses specified in water quality standards for each waterbody or segment whether or not they are being attained.

***Dilution.*** The addition of some quantity of less-concentrated liquid (water) that results in a decrease in the original concentration.

**Direct runoff.** *Water that flows over the ground surface or through the ground directly into streams, rivers, and lakes.*

**Discharge.** *Flow of surface water in a stream or canal, or the outflow of groundwater from a flowing artesian well, ditch, or spring. Can also apply to discharge of liquid effluent from a facility or to chemical emissions into the air through designated venting mechanisms.*

**Discharge permits (under VPDES).** *A permit issued by the U.S. EPA or a state regulatory agency that sets specific limits on the type and amount of pollutants that a municipality or industry can discharge to a receiving water; it also includes a compliance schedule for achieving those limits. The permit process was established under the National Pollutant Discharge Elimination System, under provisions of the Federal Clean Water Act.*

**Domestic wastewater.** *Also called sanitary wastewater, consists of wastewater discharged from residences and from commercial, institutional, and similar facilities.*

**Drainage basin.** *A part of a land area enclosed by a topographic divide from which direct surface runoff from precipitation normally drains by gravity into a receiving water. Also referred to as a watershed, river basin, or hydrologic unit.*

**Effluent.** *Municipal sewage or industrial liquid waste (untreated, partially treated, or completely treated) that flows out of a treatment plant, septic system, pipe, etc.*

**Effluent limitation.** *Restrictions established by a state or EPA on quantities, rates, and concentrations in pollutant discharges.*

**Existing use.** *Use actually attained in the waterbody on or after November 28, 1975, whether or not it is included in the water quality standards (40 CFR 131.3).*

**GIS.** *Geographic Information System. A system of hardware, software, data, people, organizations and institutional arrangements for collecting, storing, analyzing and disseminating information about areas of the earth. (Dueker and Kjerne, 1989)*

**Hydrologic cycle.** *The circuit of water movement from the atmosphere to the earth and its return to the atmosphere through various stages or processes, such as precipitation, interception, runoff, infiltration, storage, evaporation, and transpiration.*

**Hydrology.** *The study of the distribution, properties, and effects of water on the earth's surface, in the soil and underlying rocks, and in the atmosphere.*

**In situ.** *In place; in situ measurements consist of measurements of components or processes in a full-scale system or a field, rather than in a laboratory.*

**Margin of safety (MOS).** *A required component of the TMDL that accounts for the uncertainty about the relationship between the pollutant loads and the quality of the*

*receiving waterbody (CWA section 303(d)(1)(C)). The MOS is normally incorporated into the conservative assumptions used to develop TMDLs (generally within the calculations or models) and approved by EPA either individually or in state/EPA agreements. If the MOS needs to be larger than that which is allowed through the conservative assumptions, additional MOS can be added as a separate component of the TMDL (in this case, quantitatively, a  $TMDL = LC = WLA + LA + MOS$ ).*

**Mean.** The sum of the values in a data set divided by the number of values in the data set.

**MGD.** Million gallons per day. A unit of water flow, whether discharge or withdraw.

**Monitoring.** *Periodic or continuous surveillance or testing to determine the level of compliance with statutory requirements and/or pollutant levels in various media or in humans, plants, and animals.*

**Narrative criteria.** *Nonquantitative guidelines that describe the desired water quality goals.*

**National Pollutant Discharge Elimination System (NPDES).** *The national program for issuing, modifying, revoking and re-issuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Clean Water Act.*

**Natural waters.** *Flowing water within a physical system that has developed without human intervention, in which natural processes continue to take place.*

**Non-point source.** *Pollution that originates from multiple sources over a relatively large area. Nonpoint sources can be divided into source activities related to either land or water use including failing septic tanks, improper animal-keeping practices, forest practices, and urban and rural runoff.*

**Numeric targets.** *A measurable value determined for the pollutant of concern, which, if achieved, is expected to result in the attainment of water quality standards in the listed waterbody.*

**Organic matter.** *The organic fraction that includes plant and animal residue at various stages of decomposition, cells and tissues of soil organisms, and substances synthesized by the soil population. Commonly determined as the amount of organic material contained in a soil or water sample.*

**Peak runoff.** *The highest value of the stage or discharge attained by a flood or storm event; also referred to as flood peak or peak discharge.*

**Permit.** *An authorization, license, or equivalent control document issued by EPA or an approved federal, state, or local agency to implement the requirements of an environmental regulation; e.g., a permit to operate a wastewater treatment plant or to operate a facility that may generate harmful emissions.*

**Point source.** Pollutant loads discharged at a specific location from pipes, outfalls, and conveyance channels from either municipal wastewater treatment plants or industrial waste treatment facilities. Point sources can also include pollutant loads contributed by tributaries to the main receiving water stream or river.

**Pollutant.** Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, Bacterial materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water. (CWA section 502(6)).

**Pollution.** Generally, the presence of matter or energy whose nature, location, or quantity produces undesired environmental effects. Under the Clean Water Act, for example, the term is defined as the man-made or man-induced alteration of the physical, Bacterial, chemical, and radiological integrity of water.

**Public comment period.** The time allowed for the public to express its views and concerns regarding action by EPA or states (e.g., a Federal Register notice of a proposed rule-making, a public notice of a draft permit, or a Notice of Intent to Deny).

**Raw sewage.** Untreated municipal sewage.

**Receiving waters.** Creeks, streams, rivers, lakes, estuaries, ground-water formations, or other bodies of water into which surface water and/or treated or untreated waste are discharged, either naturally or in man-made systems.

**Restoration.** Return of an ecosystem to a close approximation of its presumed condition prior to disturbance.

**Riparian areas.** Areas bordering streams, lakes, rivers, and other watercourses. These areas have high water tables and support plants that require saturated soils during all or part of the year. Riparian areas include both wetland and upland zones.

**Riparian zone.** The border or banks of a stream. Although this term is sometimes used interchangeably with floodplain, the riparian zone is generally regarded as relatively narrow compared to a floodplain. The duration of flooding is generally much shorter, and the timing less predictable, in a riparian zone than in a river floodplain.

**Runoff.** That part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into receiving waters.

**Slope.** The degree of inclination to the horizontal. Usually expressed as a ratio, such as 1:25 or 1 on 25, indicating one unit vertical rise in 25 units of horizontal distance, or in a decimal fraction (0.04), degrees (2 degrees 18 minutes), or percent (4 percent).

**Stakeholder.** Any person with a vested interest in assessment of natural condition or TMDL development.

**Standard.** In reference to water quality (e.g. pH 6 – 9 SU limit).

**Storm runoff.** *Storm water runoff, snowmelt runoff, and surface runoff and drainage; rainfall that does not evaporate or infiltrate the ground because of impervious land surfaces or a soil infiltration rate lower than rainfall intensity, but instead flows onto adjacent land or into waterbodies or is routed into a drain or sewer system.*

**Streamflow.** *Discharge that occurs in a natural channel. Although the term "discharge" can be applied to the flow of a canal, the word "streamflow" uniquely describes the discharge in a surface stream course. The term "streamflow" is more general than "runoff" since streamflow may be applied to discharge whether or not it is affected by diversion or regulation.*

**Stream restoration.** *Various techniques used to replicate the hydrological, morphological, and ecological features that have been lost in a stream because of urbanization, farming, or other disturbance.*

**Surface area.** *The area of the surface of a waterbody; best measured by planimetry or the use of a geographic information system.*

**Surface runoff.** *Precipitation, snowmelt, or irrigation water in excess of what can infiltrate the soil surface and be stored in small surface depressions; a major transporter of nonpoint source pollutants.*

**Surface water.** *All water naturally open to the atmosphere (rivers, lakes, reservoirs, ponds, streams, impoundments, seas, estuaries, etc.) and all springs, wells, or other collectors directly influenced by surface water.*

**Topography.** *The physical features of a geographic surface area including relative elevations and the positions of natural and man-made features.*

**Total Maximum Daily Load (TMDL).** *The sum of the individual wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources and natural background, plus a margin of safety (MOS). TMDLs can be expressed in terms of mass per time, toxicity, or other appropriate measures that relate to a state's water quality standard.*

**Tributary.** *A lower order-stream compared to a receiving waterbody. "Tributary to" indicates the largest stream into which the reported stream or tributary flows.*

**Variance.** *A measure of the variability of a data set. The sum of the squared deviations (observation – mean) divided by (number of observations) – 1.*

**DCR.** Department of Conservation and Recreation.

**VADEQ.** Virginia Department of Environmental Quality.

**VDH.** Virginia Department of Health.

**Wastewater.** *Usually refers to effluent from a sewage treatment plant. See also **Domestic wastewater**.*

**Wastewater treatment.** *Chemical, Bacterial, and mechanical procedures applied to an industrial or municipal discharge or to any other sources of contaminated water to remove, reduce, or neutralize contaminants.*

**Water quality.** *The Bacterial, chemical, and physical conditions of a waterbody. It is a measure of a waterbody's ability to support beneficial uses.*

**Water quality criteria.** *Levels of water quality expected to render a body of water suitable for its designated use, composed of numeric and narrative criteria. Numeric criteria are scientifically derived ambient concentrations developed by EPA or states for various pollutants of concern to protect human health and aquatic life. Narrative criteria are statements that describe the desired water quality goal. Criteria are based on specific levels of pollutants that would make the water harmful if used for drinking, swimming, farming, fish production, or industrial processes.*

**Water quality standard.** *Law or regulation that consists of the beneficial designated use or uses of a waterbody, the numeric and narrative water quality criteria that are necessary to protect the use or uses of that particular waterbody, and an antidegradation statement.*

**Watershed.** *A drainage area or basin in which all land and water areas drain or flow toward a central collector such as a stream, river, or lake at a lower elevation.*

## **Appendix B**

CLASS VII RECLASSIFICATION LETTER TO USEPA USED IN LAST TRIENNIAL REVIEW

**Dated October 14, 2003**

### **ATTACHMENT III – CLASS VII RE-CLASSIFICATION LETTER USED IN LAST TRIENNIAL REVIEW**

October 14, 2003

#### **MEMORANDUM**

TO: EPA Region 3  
FROM: David C. Whitehurst  
SUBJECT: Supporting Data for Proposed Class VII (Swamp Waters) pH Criteria

As required by 40 CFR §131.20, the purpose of this memo is to provide supporting data and information for Virginia's proposed classification change for several water bodies within the state. The Virginia Department of Environmental Quality (DEQ) has adopted a revised numerical pH criterion for some waters of the southeastern portion of the state as an effort to reflect the natural conditions of those waters and as an aid for the appropriate assessment of these waters. This criterion change is allowed according to 40 CFR §131.11. (b). (1). (iii).

These waters were classified by the Virginia Water Quality Standards as Class III Coastal and Piedmont Nontidal Waters (9 VAC 25-260-50), with a pH range of 6.0 to 9.0 as is the case for all classes of waters statewide. The amendments to 9 VAC 25-260-5 define Class VII waters as "...waters with naturally occurring low pH and low dissolved oxygen caused by:

(1) low flow velocity that prevents mixing and re-aeration of stagnant, shallow waters and (2) decomposition of vegetation that lowers dissolved oxygen concentrations and causes tannic acids to color the water and lower the pH." The proposed pH criterion for Class VII waters is 4.3 to 9.0. The proposed amendments are a change in the numerical criterion for a particular type or class of water body and not an alteration of designated uses. Aquatic life uses shall be maintained and required effluent pH limits of 6.0 - 9.0 shall be maintained for all discharges to Class VII waters.

The water bodies that are proposed for Class VII designation are frequently referred to as blackwater streams/rivers due to the characteristic dark color that is a result of staining by fulvic and humic acids. The water chemistry is generally characterized by low buffering capacity and high acidity. The pH in peat draining blackwater systems can range from 3.5 - 6 and in mineral soil draining systems from 4 - 7. The naturally occurring acidic conditions of Mid-Atlantic Coastal Plain blackwater streams is well documented in peer reviewed scientific literature (Appendices A, B and G). The US Environmental Protection Agency 1997 publication "Field and laboratory methods for macroinvertebrate and habitat assessment of low gradient nontidal streams" states that "Coastal plain streams are often naturally acidic due to the high concentration of humic and fulvic acids found in the water draining swamp soils. The pH of these streams most often ranges from 3.5 to 7.5." (Appendix B)

Ambient water quality monitoring field pH data for stations within waters that are proposed as Class VII is presented in Appendix C as is a photo representative of the water body. Where sufficient data was available, pH values were averaged for each monitoring station on a water body and graphed. Individual pH values for each monitoring station were also graphed. The majority (> 50%) of individual pH values were below 7.

In an effort to confirm that point source discharges were not contributing to the low pH values, the DEQ permitting database was queried for pH violations (pH< 6) at permitted outfalls located on the proposed water bodies (Appendix D). One facility had two compliance violations (failure to report pH), one facility had three violations for discharge over the upper limit for pH (pH> 9), and one facility for effluent discharge less than the lower require limit (pH<6). All of the discharges are less than 1.0 MGD and the discharges are to small tributaries to the proposed Class VII waterbodies.

At the request of EPA Region 3 for DEQ to demonstrate that proposed Class VII waters are not impacted by acid rain that would unnaturally lower pH, daily precipitation data from the Virginia State Climatology Office was compared to DEQ ambient water quality monitoring field pH data (Appendix E). Daily rainfall data for 1996 - 2003 was filtered according to water sample collection dates at DEQ ambient

water quality monitoring stations that are within an approximate 15-mile radius of precipitation monitoring stations. Precipitation amounts and field pH values were graphed together and correlation factors calculated. The only discernable pattern was a general negative correlation of precipitation to pH and the majority of r-values were well below 0.5, which does not indicate a close correlation between the variables.

According to an EPA web site (<http://www.epa.gov/airmarkets/acidrain/index.html>) the natural pH of rain is about 5.5 and the average pH of rainfall for the southeast/south-central region of Virginia, where the proposed Class VII waters are located, is 4.6 (Appendix F). Due to the naturally acidic conditions and low acid neutralizing capacity of the Virginia Coastal Plains watersheds, they are considered to be sensitive to atmospheric acid deposition (acid rain) and the effects may either be ameliorated or exacerbated by the type of land use in the watershed. A joint pilot study of episodic acidification of first order blackwater streams in southeastern Virginia conducted by Virginia Commonwealth University and DEQ found significant differences between pH depression duration and magnitude. Study sites within undisturbed old growth watersheds showed the greatest pH depressions and study sites within deforested and agricultural watersheds exhibited less severe pH depressions (Appendix G).

Other states such as North Carolina have narrative and numerical criteria in their water quality standards that recognize some waters may have characteristics outside of the "normal" range established by statewide standards (Appendix H). In light of this and other information presented here, it is logical and necessary that Virginia alter its numerical criterion for pH to reflect the naturally occurring conditions within certain water bodies in the state.

#### Attachments